

**From:** Keith Williams  
**Sent:** February 26, 2024 9:24 AM  
**To:** Emanuel Kataev  
**CC:** emanuel@sagelegal.nyc; Justin Reilly  
**Subject:** RE: Activity in Case 1:23-cv-04667-CBA-PK Martinez et al v. Atlantis Super Wash Center Inc. et al  
Certificate of Service

Emanuel,

We are struggling to understand why you have waited until the eve of the motion being filed to ask for an extension to draft a reply brief, when you have known for at least the last three weeks that you would be moving to a new firm and taking this case with you. Had you reached out then with your new contact information, we could have sent you a copy of the opposition on its due date, obviating the need for an extension related to your reply. Notwithstanding the delay, we will agree to a one week extension, as a courtesy, up to and including March 4, 2024.

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**Keith E. Williams, Esq.**  
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**PLEASE NOTE OUR NEW FIRM NAME**

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**From:** Emanuel Kataev <mail@emanuelkataev.com>  
**Sent:** February 25, 2024 10:49 AM  
**To:** Justin Reilly <justin@nhglaw.com>; Keith Williams <Keith@nhglaw.com>  
**Cc:** emanuel@sagelegal.nyc

**Subject:** Re: Activity in Case 1:23-cv-04667-CBA-PK Martinez et al v. Atlantis Super Wash Center Inc. et al Certificate of Service

Following up on the below. Since I have not yet received the papers, I ask for Plaintiffs' consent for a two week extension of time to file a reply.

Thanks and best,

**Emanuel Kataev, Esq.**  
**Sage Legal LLC**

**Emanuel Kataev, Esq., P.C.**

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On Fri, Feb 23, 2024 at 12:55 AM Emanuel Kataev <[mail@emanuelkataev.com](mailto:mail@emanuelkataev.com)> wrote:

Counselors:

I intend to file substitution paperwork sometime between "today" and Monday. May I trouble one of you to send me your opposition papers to see whether I may timely file the reply memorandum of law by Monday, February 26, 2024?

Thanks and best,

**Emanuel Kataev, Esq.**  
**Sage Legal LLC**

**Emanuel Kataev, Esq., P.C.**

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On Mon, Feb 19, 2024 at 3:06 PM <[ecf\\_bounces@nyed.uscourts.gov](mailto:ecf_bounces@nyed.uscourts.gov)> wrote:

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**U.S. District Court**

**Eastern District of New York**

### **Notice of Electronic Filing**

The following transaction was entered by Williams, Keith on 2/19/2024 at 3:05 PM EST and filed on 2/19/2024

**Case Name:** Martinez et al v. Atlantis Super Wash Center Inc. et al  
**Case Number:** [1:23-cv-04667-CBA-PK](#)  
**Filer:** Mateo Guzman  
Ester Martinez  
Leria Perez Zapata

**Document Number:** [18](#)

### **Docket Text:**

**[CERTIFICATE OF SERVICE by Mateo Guzman, Ester Martinez, Leria Perez Zapata re: Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss \(Williams, Keith\)](#)**

**1:23-cv-04667-CBA-PK Notice has been electronically mailed to:**

Emanuel Kataev &nbsp; &nbsp; [emanuel@mllaborlaw.com](mailto:emanuel@mllaborlaw.com), [4119461420@filings.docketbird.com](mailto:4119461420@filings.docketbird.com),  
[ekesq2014@recap.email](mailto:ekesq2014@recap.email), [emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc), [mail@emanuelkataev.com](mailto:mail@emanuelkataev.com)

Justin M. Reilly &nbsp; &nbsp; [justin@nhglaw.com](mailto:justin@nhglaw.com), [nhglaw@nhglaw.com](mailto:nhglaw@nhglaw.com)

Keith E. Williams &nbsp; &nbsp; [keith@nhglaw.com](mailto:keith@nhglaw.com), [nhglaw@nhglaw.com](mailto:nhglaw@nhglaw.com)

**1:23-cv-04667-CBA-PK Notice will not be electronically mailed to:**

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**Document description:**Main Document

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